April 15, 2003

Mr. Mike Stevens
Univar USA, Inc.
7425 East 30th Street
Indianapolis, Indiana 46219

Dear Mr. Stevens:

Re: Exempt Construction and Operation Status,
097-16976-00247

The application from Univar USA, Inc. (formerly Vopak, and Van Waters & Rogers), received on March 25, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following construction and operation of soil vapor extraction and chemical distribution, to be located at 7425 East 30th Street, Indianapolis, Indiana 46219, is classified as exempt from air pollution permit requirements:

(a) Solvent storage and handling, including twenty-seven (27) existing vertical fixed roof liquid storage tanks, identified as TS-01 through TS-04, and TS-09 through TS-27, TS-39, TS-40, TC-04, TC-13, and TC-15, installed at various times ranging from 1969 through 1995, with maximum capacities ranging from 2,000 to 30,000 gallons, venting to Stack 1, using no control.

(b) One (1) soil vapor extraction unit, to be installed in June 2003, identified as emissions unit 2, venting to stack 2, using no control.

The following conditions shall be applicable:

(a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuos opacity monitor in a six (6) hour period.

(b) Pursuant to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb), the following applies to storage tank TS-15,

(1) The owner of this storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

(2) The owner or operator shall notify the Administrator within thirty (30) days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.

(3) Available data on the storage temperature may be used to determine the maximum true vapor pressure as follows:

(A) May be obtained from standard reference texts, or

(B) Determined by ASTM Method D2879-83; or

(C) Measured by an appropriate method approved by the Administrator; or

(D) Calculated by an appropriate method approved by the Administrator.

An application or notification shall be submitted in accordance with 326 IAC 2 to the OES and IDEM, Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Angelique Oliger at 327-2846 or aoliger@indygov.org.

Sincerely,

Original Signed by John B. Chavez
John B. Chavez, Administrator

aco

cc: File
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, Angelique Oliger

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Univar USA, Inc. (formerly Vopak, and Van Waters & Rogers)
Source Location:	7425 East 30th Street, Indianapolis, Indiana 46219
County:	Marion
SIC Code:	5169
Operation Permit No.:	097-16976-00247
Permit Reviewer:	Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from Univar USA (formerly Vopak, and Van Waters & Rogers), Inc. relating to the construction and operation of soil vapor extraction and chemical distribution.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Solvent storage and handling, including twenty-seven (27) existing vertical fixed roof liquid storage tanks, identified as TS-01 through TS-04, and TS-09 through TS-27, TS-39, TS-40, TC-04, TC-13, and TC-15, installed at various times ranging from 1969 through 1995, with maximum capacities ranging from 2,000 to 30,000 gallons, venting to Stack 1, using no control.

(b) One (1) new soil vapor extraction unit, to be installed in June 2003, identified as emissions unit 2, venting to stack 2, using no control.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP 5206-01, issued on September 14, 1990; and

(b) Renewal of OP 5206-01, issued on July 31, 1998.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
1	Tank Emissions	1	0.167	vent	ambient
2	Soil Vapor Extraction	20	0.33	140-240	108

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 25, 2003.

Emission Calculations

See Appendix A (page one of one) of this document for a summary of tank emissions calculations. These calculations are based on Tanks 4.0, developed by the American Petroleum Institute (API). The calculations submitted by the applicant for soil remediation have been verified and found to be accurate and correct.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	negligible
PM-10	negligible
SO_2	negligible
VOC	3.717
CO	negligible
NO_x	negligible

HAP's	Potential To Emit (tons/year)
ethylbenzene	0.006
ethylidene dichloride	0.017
methylchloroform	0.172
tetrachloroethylene	0.603
toluene	0.047
trichloroethylene	0.144
vinyl chloride	0.112
vinylidene chloride	0.008
xylenes	0.020
methanol	0.029
hexone	0.008
methylethylketone	0.154
methylene chloride	0.002
TOTAL	1.322

(a) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate

matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	negligible
PM10	negligible
SO_2	negligible
VOC	2.720
CO	negligible
NO_x	negligible
Single HAP	0.603
Combination HAPs	1.322

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Soil Remediation	negligible	negligible	negligible	0.997	negligible	negligible
PSD or Offset Threshold Level	100	100	100	100	100	100

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this exemption 097-16976-00247, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

Federal Rule Applicability

(a) This source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb), because the storage tank TS-15 has a capacity greater than forty (40) cubic meters (m^3), it was constructed after July 23, 1984, and it stores volatile organic liquid. None of the other storage tanks are subject to this rule. The only other storage tanks with capacities greater than forty (40) cubic meters (m^3) are TS-01, TS-09, and TC-04. Storage tanks, TS-01 and TS-09, were constructed prior to July 23, 1984. Storage tank, TC-04, was installed after July 23, 984, but does not contain volatile organic liquids. Therefore storage tank, TS-15, is the only tank subject to 40 CFR 60 Subpart Kb. Pursuant to this subpart,

(1) The owner of this storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

(2) The owner or operator shall notify the Administrator within thirty (30) days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.

(3) Available data on the storage temperature may be used to determine the maximum true vapor pressure as follows:

(A) May be obtained from standard reference texts, or

(B) Determined by ASTM Method D2879-83; or

(C) Measured by an appropriate method approved by the Administrator; or

(D) Calculated by an appropriate method approved by the Administrator.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

Only sources required to obtain a permit are required to prepare and maintain a Preventive Maintenance Plan (PMP). The potential to emit regulated air pollutants appears to be below any minimum permitting threshold or permitting provisions found in 326 IAC 2-1.1-2 (Permit Review Rules: General Provisions; Applicability) and or 326 IAC 2-5.1 (Construction of New Sources). Therefore, this source is not subject to 326 IAC 1-6-3.

326 IAC 2-4.1(HAPs Major Sources; New Source Toxics Control)

The source has the potential to emit of less than ten (10) tons per year of single HAP and less than twenty-five (25) tons per year of any combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit less than ten (10) tons per year of NO_x and/or VOC in Marion County and less that one hundred (100) tons per year of Particulate Matter (PM). In addition, the potential to emit HAPs is less than any major source threshold and, as such, is not required to obtain a permit under 326

IAC 2-7 (Part 70 Permit Program). As a result, 326 IAC 2-6 (Emission Reporting) does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6 (Particulate Rules)

(a) This source does not have the potential to emit Particulate Matter (PM) in excess of one hundred (100) tons per year or have actual PM emissions of greater than ten (10) tons per year. Therefore, 326 IAC 6-1 does not apply to this source.

(b) This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. This source does not have particulate emissions. Therefore, 326 IAC 6-3 does not apply to this source

326 IAC 8 (Volatile Organic Compound Rules)

(a) This source does not have the potential to emit Volatile Organic Compounds in excess of 25 tons per year therefore, 326 IAC 8-1-6 does not apply.

(b) There are no other 326 IAC 8 rules applicable to this source.

Conclusion

The construction and operation of soil vapor extraction and chemical distribution for Univar USA, Inc. located at 7425 East 30th Street, Indianapolis, Indiana 46219 shall be exempt from air pollution control permit requirements by exemption 097-16976-00247.

Appendix A: Emissions Calculations
Company Name: Univar USA, Inc.
Address City IN Zip: 7425 East 30th Street, Indianapolis, Indiana 46219
Permit Number: 097-16976-00247
Reviewer: Angelique Oliger
Date: April 15, 2003

Summary of Tanks

Tank ID	installation date	VOC emissions (tons/yr)	HAPs	HAP emissions tons/yr
TS-01	1978	0.014		
TS-02	1978	0.009		
TS-03	1978	0.029	methanol	0.029
TS-04	1978	0.008	hexone	0.008
TS-09	1969	0.088		
TS-10	1978	0.039		
TS-11	1978	0.027	toluene	0.027
TS-12	1978	0.033		
TS-13	1978	0.002		
TS-14	1978	0.032		
TS-15	1978	0.024		
TS-16	1978	0.154	methylethylketone	0.154
TS-17	1978	0.009	xylene	0.009
TS-18	1978	0.002		
TS-19	1978	0.001		
TS-20	1978	0.002		
TS-21	1978	0.019	tetrachloroethylene	0.019
TS-22	1978	0.114		
TS-23	1978	0.118		
TS-24	1978	0.216	**Total HAPs**	**0.245 tons/yr**
TS-25	1978	0.000		
TS-26	1995	0.028		
TS-27	1969	0.000		
TS-39	1994	0.028		
TS-40	1994	0.000		
TC-04	1990	0.000		
TC-13	1988	0.000		
TC-15	1995	0.000		
	Total VOCs	**0.997 tons/yr**		